

Robert J. Lack  
 Andrew M. Englander  
 FRIEDMAN KAPLAN SEILER & ADELMAN LLP  
 One Gateway Center, 25th Floor  
 Newark, NJ 07102-5311  
 (973) 877-6400  
*Attorneys for Crossclaim Plaintiff Interfor, Inc.*

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEW JERSEY

-----X  
 NXIVM CORPORATION, formerly known as EXECUTIVE  
 SUCCESS PROGRAMS, INC. and FIRST PRINCIPLES, INC.,

Plaintiffs,

- against -

MORRIS SUTTON, ROCHELLE SUTTON, THE ROSS  
 INSTITUTE, RICK ROSS a/k/a "RICKY" ROSS, STEPHANIE  
 FRANCO, PAUL MARTIN, Ph.D., and WELLSRING RETREAT,  
 INC.,

Defendants.

Civil Action No. 2:06-cv-01051  
 (KSH/CLW)

Hon. Katharine S. Hayden, U.S.D.J.  
 Hon. Cathy L. Waldor, U.S.M.J.

Motion Day: April 19, 2021

-----X  
 RICK ROSS,

Counterclaim Plaintiff,

- against -

KEITH RANIERE, NANCY SALZMAN,  
 KRISTIN KEEFFE, INTERFOR, INC.,  
 JUVAL AVIV, JANE DOE and JOHN DOES 1-10,

Counterclaim Defendants.

**NOTICE OF CROSSCLAIM  
 PLAINTIFF INTERFOR, INC.'S  
 CROSS-MOTION TO COMPEL  
 COMPLIANCE WITH WRIT OF  
 EXECUTION, OR,  
 ALTERNATIVELY, FOR AN  
 ORDER DIRECTING  
 TOMPKINS MCGUIRE TO  
 TURN OVER NXIVM FUNDS  
 TO INTERFOR**

*(Interfor, Inc. v. NXIVM Corp.)*

-----X  
 INTERFOR, INC. and JUVAL AVIV,

Crossclaimants,

- against -

NXIVM CORPORATION, KEITH RANIERE,  
 NANCY SALZMAN and KRISTIN KEEFFE,

Crossclaim Defendants.

TO: Brian English, Esq.  
TOMPKINS MCGUIRE  
WACHENFELD & BARRY LLP  
3 Becker Farm Road, Fourth Floor  
Roseland, NJ 07068-1726

*Pro Se Movant*

Anthony J. Sylvester, Esq.  
SHERMAN WELLS SYLVESTER  
& STAMELMAN LLP  
210 Park Avenue, 2nd Floor  
Florham Park, NJ 07932

*Attorneys for Defendants the Estate  
of Morris Sutton, Rochelle Sutton,  
and Stephanie Franco*

NXIVM Corp.  
5 Southside Drive, Unit 11  
Clifton Park, NY 12065

Matthew J. Fedor, Esq.  
DRINKER BIDDLE & REATH LLP  
500 Campus Drive  
Florham Park, NJ 07932-1047

*Attorneys for Cross-Defendant Keith  
Ranieri*

Nancy Salzman  
c/o Robert Soloway, Esq.  
ROTHMAN SCHNEIDER SOLOWAY  
& STERN P.C.  
100 Lafayette Street, Suite 501  
New York, NY 10013

**PLEASE TAKE NOTICE** that on April 19, 2021, at 9:00 a.m., or as soon thereafter as counsel may be heard, crossclaim plaintiff Interfor, Inc. (“Interfor”) shall cross-move before the Honorable Cathy L. Waldor, U.S.M.J., seeking an Order: (1) directing *pro se movant* Tompkins, McGuire, Wachenfeld & Barry LLP (“Tompkins McGuire”) to comply with the Writ of Execution served on Tompkins McGuire by Interfor, or, alternatively, (2) directing Tompkins McGuire to transfer \$50,000 in funds belonging to its former client, crossclaim defendant NXIVM Corp. (“NXIVM”), to Interfor (through the below-signed counsel) in partial satisfaction of a final judgment entered by this Court in favor of Interfor and against NXIVM.

The grounds for this motion are set forth in the following documents filed herewith: (i) Crossclaim Plaintiff Interfor, Inc.’s Brief in Opposition to Tompkins McGuire’s Motion to Quash Writ of Execution and to Apply Funds to Outstanding Bills and in Support of Cross-Motion to Compel Compliance with Writ or Transfer Funds to Interfor, dated April 5,

2021; and (ii) the Declaration of Andrew M. Englander, dated April 5, 2021, and the exhibits thereto.

A proposed form of Order is attached.

Dated: Newark, New Jersey  
April 5, 2021

FRIEDMAN KAPLAN SEILER &  
ADELMAN LLP

s/ Andrew M. Englander

Robert J. Lack

Andrew M. Englander

One Gateway Center, 25th Floor

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*Attorneys for Crossclaim Plaintiff Interfor, Inc*